

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:23 CR 293 HEA/JSD
)	
BRANDON BOSLEY,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE/ TRAVEL

Defendant, Brandon Bosley, through his attorney, Diane Dragan, requests the Court modify his conditions of release to allow Mr. Bosley to travel to Utica, Mississippi, to attend the funeral of his aunt, Virge Mae Frazier.

The funeral is scheduled for Thursday, May 22nd, 2025, at 1:00 p.m. at St. John MB Church, 5456 Morrison Road, Utica, Mississippi. Mr. Bosley will drive with family members to Utica, Mississippi. Given that there will be family matters to address while in Mississippi, he will return no later than Sunday, May 25th, 2025.

Mr. Bosley’s Pretrial Services Officer does not oppose this request. The Pretrial Services Officer will be provided with his travel itinerary prior to traveling.

Given the nature of the request, the Court should modify his conditions to allow him to travel to the funeral in Utica, Mississippi, that allows for spending time with his family during this time of grief.

If granted, Mr. Bosley will communicate his travel itinerary to his pretrial services officer in advance of the travel. The Assistant United States Attorney indicated he would not oppose any changes to the bond conditions supported by the pretrial officer.

Conclusion

Based on the above, Mr. Bosley requests the Court modify his conditions so that he can travel to his aunt's funeral in Utica, Mississippi.

Dated: May 20, 2025

Respectfully submitted,

/s/ Diane Dragan
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CERTIFICATE OF SERVICE

Assistant Federal Public Defender Diane Dragan certifies that she caused Defendant's Motion to Modify Conditions of Release to be filed electronically with the Clerk of the Court, to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney.

Dated: May 20, 2025.

/s/ Diane Dragan